

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

UL LLC,

*Plaintiff-Counterclaim Defendant,*

-v-

JOSHUA CALLINGTON,

*Defendant, Counterclaim Plaintiff.*

Case No. 1:24-cv-05631  
Hon. Andrea R. Wood

**MOTION TO EXTEND DEADLINE FOR AMENDMENT**  
**PURSUANT TO FED. R. CIV. P. 15(a)(1)(B)**

Pursuant to Rule 6 of the Federal Rules of Civil Procedure, Fed. R. Civ. P. 6(b)(1), Defendant / Counterclaim Plaintiff, Joshua Callington (“Mr. Callington”), by and through the undersigned counsel, hereby moves to enlarge the default timeline for amending his pleading under Fed. R. Civ. P. 15(a)(1)(B), for the following reasons:

1. On October 11, 2025, Mr. Callington filed his original pleading, *see* Answer, Defenses and Counterclaims [Dkt. 110], in this action.

2. On December 12, 2025, Plaintiff / Counterclaim Defendant UL LLC (“UL”) responded, in turn, by filing consecutive motions to dismiss Mr. Callington’s counterclaims and to strike his affirmative defenses, pursuant to Fed. R. Civ. P. 12(b) and (f) [Dkt 116-119.].

3. Pursuant to the default timelines set forth by the Federal Rules of Civil Procedure, a party seeking to amend its pleading as a matter of course must

ordinarily do so within “21 days after service of a motion under Rule 12.” Fed. R. Civ. P. 15(a)(1)(B).

4. Because that expedited timeline coincides with the winter holiday period, during which public schools are closed and many attorneys are traveling and/or hosting extended family while also caring for young children, a modest enlargement of the default time period is both necessary and supported by good cause, to allow for the preparation and filing of Mr. Callington’s amended pleading.

\* \* \*

WHEREFORE, Mr. Callington respectfully requests the entry of an order extending the default timeline for amending his pleading in accordance with Fed. R. Civ. P. 15(a)(1)(B) to January 22, 2026.

Dated: January 5, 2026

Respectfully submitted,

By: /s/ Agatha M. Cole  
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